

# Exhibit B

## Plaintiffs Proposed Methodology for Retrieving Google Drive Documents Linked to Within Google Emails

### *Prerequisites*

1. Access to (i) a review platform such as *Relativity* containing an export of Google emails and Google Drive documents from Google Vault and (ii) the underlying SQL database containing those emails and documents. For purposes of this discussion, we will use Uber's vendor Lighthouse as an actor with such access, but another actor with such access would also work.
2. An experienced programmer with expertise in using the Google Drive API ("programmer") as well as appropriate access to Uber's Google Workspace environment.

### *Process*

1. Have Lighthouse extract the links to Google Drive documents from Google Mail. Our understanding is that Lighthouse has a proprietary program ("Google Parser") which does this extraction and also preserves metadata establishing the relationship of each extracted link to its parent Google email.
2. Using the extracted links, Lighthouse will identify (i) the Google Drive documents in its possession which correspond to those links and (ii) the links for which Lighthouse does not have a corresponding Google Drive document. Lighthouse can do this using its Google Parser, if it has that capability, or SQL queries in the SQL database.
3. If Lighthouse has a corresponding linked Google Drive document, it will compare the date and time of that document against the sent date and time of the Gmail using its Google Parser or SQL queries in the SQL database. If the document date and time is less than or equal to the Gmail sent date and time, then the Google Drive document is the correct contemporaneous one and Lighthouse will provide metadata that will enable the documents to be linked as family groups in its Relativity environment for Uber's review and, if produced, in Plaintiffs' review platform.
4. If Lighthouse does not have the link to the Google Drive document in its possession or if the copy in its possession is not contemporaneous, i.e., if the document's sent date and time is later than the sent date and time of the parent mail then add the document to a list ("Missing List"). The list should include the following metadata for each Google Drive document: (i) the ID

(BegBates) of the Gmail which contained the link, (ii) the Sent Date and time of that email, (iii) the sender of the email, including email address (iv) the recipients of the email, including email addresses, and (iv) the link url for the Google Drive document.

5. The programmer will create a program<sup>1</sup> that:
  - a. Cycles through the Missing List and for each link extracts the Google DocumentID and then retrieves its revision list, recording whether the retrieval was successful or failed, and if failed, any reported error code(s).
  - b. If the retrieval of the revision list was successful, cycle through the revision list and compare the listed revisions from latest to earliest until the latest listed revision preceding the parent email's sent date and time is identified as the revision of the correct contemporaneous document. If no such revision can be located, record that failure and proceed to process the next link in the Missing List.
  - c. If the correct revision is located, convert the file to its Microsoft equivalent and download it along with appropriate metadata. If that operation fails, record that failure, and proceed to process the next link in the Missing List.
6. Lighthouse will link each retrieved document with its metadata to its parent email for production.
7. Lighthouse will produce responsive non-privileged emails along with any corresponding linked Google Drive documents and metadata linking the documents to its parent email. The metadata produced for Google Drive documents will include an additional metadata field "Non-Contemporaneous" containing the value "Y" if a document was not the correct contemporaneous document.
8. If all the corresponding Google Drive documents for a parent email could not be produced, the produced metadata for that parent email will include an additional metadata field "Missing Google Drive Attachments" which will

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<sup>1</sup> The program steps outlined here can all be accomplished using the approach set out in [https://stackoverflow.com/questions/77467875/revert-to-specific-version-of-google-sheets-with-respect-to-specific-date-using#:~:text=This%20sample%20script%20is%20for%20Drive%20API%20v3,%60No%20revisions%20in%20%24%7Bdate%7D.%60\)%3B%0A%20%20%7D%0A%7D](https://stackoverflow.com/questions/77467875/revert-to-specific-version-of-google-sheets-with-respect-to-specific-date-using#:~:text=This%20sample%20script%20is%20for%20Drive%20API%20v3,%60No%20revisions%20in%20%24%7Bdate%7D.%60)%3B%0A%20%20%7D%0A%7D) as a foundation.

include the links to all Google Drive documents which could not be retrieved.